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AZ CORP COMMISSION  
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**BEFORE THE  
ARIZONA CORPORATION COMMISSION**

**WILLIAM A. MUNDELL  
CHAIRMAN**

**JIM IRVIN  
COMMISSIONER**

**MARC SPITZER  
COMMISSIONER**

Arizona Corporation Commission  
**DOCKETED**

FEB 07 2001

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IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**WORLDCOM'S CONCURRENCE WITH AT&T'S MOTION TO AMEND  
AND SUPPLEMENT PROCEDURAL ORDER**

WorldCom, Inc., on behalf of its regulated subsidiaries, ("WCom") concurs in the  
Motion to Amend and Supplement the Procedural Order dated June 12, 2000, filed by  
AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively

1 "AT&T") on or about February 2, 2001. WCom will not repeat the arguments made by  
2 AT&T in its motion, but incorporates those arguments by reference.

3 WCom is concerned that since Qwest Corporation ("Qwest") has chosen, in part, to  
4 demonstrate compliance with its legal requirements to open the local exchange market in  
5 its serving area, it has filed a Statement of Generally Available Terms and Conditions  
6 ("SGAT") addressing its legal obligations and processes instead of relying on existing  
7 interconnection agreements. Several of WCom's regulated subsidiaries have Commission-  
8 approved interconnection agreements with Qwest that have different terms and conditions  
9 from those found in Qwest's SGAT, and in many instances, are more detailed than  
10 Qwest's SGAT.  
11

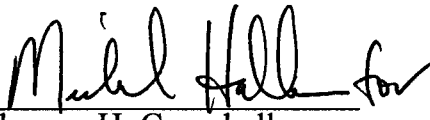
12 As noted in AT&T's motion, the workshop process in all states has been and  
13 continues to be an iterative process. WCom has raised new issues in this proceeding, in  
14 part, because these issues were raised in subsequent workshops in other states. Some of  
15 those issues remain "disputed" issues in those states. Others are undisputed and may be  
16 incorporated in Qwest's Arizona SGAT. However, whether the Hearing Division allows  
17 those disputed issues raised by WCom and AT&T to be addressed here, WCom has made  
18 its earlier filing in response to Staff's reports addressing Checklist Items 3, 7 and 10 to  
19 alert this Commission of its concerns, so it is not presumed that WCom has waived those  
20 issues in Arizona in this proceeding, or waived those issues for purposes of future  
21 arbitration proceedings that may occur in Arizona addressing these issues.  
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1           Moreover, those issues generally address legal matters, focusing particularly on  
2 whether Qwest is, through its SGAT language, attempting to in any way reduce its  
3 obligations under the federal Telecommunications Act of 1996 ("federal Act") as  
4 interpreted by the Federal Communications Commission ("FCC") and this Commission.  
5 A good example is WCom's concern relative to Checklist Item 3 about Qwest's process  
6 for ordering access to poles, ducts, conduits, and other rights of way that is inconsistent  
7 with FCC rules addressing that point. Another example is an issue raised by AT&T in the  
8 Arizona workshops on Checklist Item 7 on whether Qwest is, in fact, providing  
9 nondiscriminatory access to its directory assistance lists and allowing competitive local  
10 exchange carriers to use that data in the same manner Qwest uses the data. It is WCom's  
11 understanding that Qwest is not attempting to in any way reduce its obligations under the  
12 federal Act as interpreted by the FCC and this Commission. To the extent Qwest's SGAT  
13 language is different from the interconnection agreements executed by WCom's regulated  
14 subsidiaries with Qwest, this Commission has already approved those agreements and the  
15 language contained therein.

16  
17           Accordingly, if Qwest's SGAT is ultimately approved by the Commission, WCom  
18 is not agreeing that Qwest's SGAT language constitutes any negotiated waiver by WCom  
19 of any of Qwest's obligations under the federal Act as interpreted by the FCC and this  
20 Commission. Nor is WCom waiving any legal arguments it may have concerning Qwest's  
21 compliance with the federal Act as interpreted by the FCC and this Commission.  
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1 Dated this 7th day of February 2001.

2  
3 LEWIS AND ROCA

4   
5 Thomas H. Campbell  
6 40 N. Central Avenue  
7 Phoenix, Arizona 85007

8 - AND -

9 Thomas F. Dixon  
10 WorldCom, Inc.  
11 707 -17<sup>th</sup> Street, #3900  
12 Denver, Colorado 80202  
13 303-390-6206

14 Attorneys for WorldCom, Inc.

15 ORIGINAL and ten (10)  
16 copies of the foregoing filed  
17 this 7<sup>th</sup> day of February, 2001,  
18 with:

19 Arizona Corporation Commission  
20 Docket Control - Utilities Division  
21 1200 W. Washington Street  
22 Phoenix, Arizona 85007

23 COPY of the foregoing hand-  
24 delivered this 7<sup>th</sup> day of February,  
25 2001, to:

26 Maureen Scott  
Legal Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007

Jane Rodda, Administrative Law Judge  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007

1 Deborah Scott, Director  
Utilities Division  
2 Arizona Corporation Commission  
1200 W. Washington Street  
3 Phoenix, Arizona 85007  
4 COPY of the foregoing mailed  
this 7<sup>th</sup> day of February, 2001, to:  
5  
6 Mark J. Trierweiler  
Vice President – Government Affairs  
AT&T Communications of the  
7 Mountain States  
111 West Monroe, Suite 1201  
8 Phoenix, Arizona 85003  
9 Scott Wakefield  
Residential Utility Consumer Office  
10 2828 N. Central Avenue  
Phoenix, Arizona 85004  
11  
12 Maureen Arnold  
US West Communications, Inc.  
3033 N. Third Street  
13 Room 1010  
Phoenix, Arizona 85012  
14  
15 Mark Dioguardi  
Tiffany and Bosco PA  
500 Dial Tower  
16 1850 N. Central Avenue  
Phoenix, Arizona 85004  
17  
18 Thomas L. Mumaw  
Snell & Wilmer  
One Arizona Center  
19 Phoenix, Arizona 85004-0001  
20  
21 Andrew O. Isar  
TRI  
4312 92<sup>nd</sup> Avenue N.W.  
22 Gig Harbor, Washington 98335  
23  
24 Michael Patten  
Brown & Bain, P.A.  
2901 N. Central Avenue  
Phoenix, Arizona 85012  
25  
26

- 1 Darren S. Weingard  
Stephen H. Kukta
- 2 Sprint Communications Co., L.P.  
1850 Gateway Drive, 7<sup>th</sup> Floor
- 3 San Mateo, CA 94404-2467
- 4 Timothy Berg  
Fennemore, Craig, P.C.
- 5 3003 N. Central Avenue  
Suite 2600
- 6 Phoenix, Arizona 85012-3913
- 7 Thomas M. Dethlefs  
Charles Steese
- 8 US West, Inc.  
1801 California Street, Ste. 5100
- 9 Denver, Colorado 80202
- 10 Joan S. Burke  
Osborn & Maledon
- 11 2929 N. Central Avenue  
21<sup>st</sup> Floor
- 12 Phoenix, Arizona 85067-6379
- 13 Richard S. Wolters  
AT&T & TCG
- 14 1875 Lawrence Street  
Suite 1575
- 15 Denver, Colorado 80202
- 16 Michael M. Grant  
Todd C. Wiley
- 17 Gallagher & Kennedy  
2600 N. Central Avenue
- 18 Phoenix, Arizona 85004-3020
- 19 Richard M. Rindler  
Morton J. Posner
- 20 Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300
- 21 Washington, D.C. 20007-5116
- 22 Mary Tee  
Electric Lightwave, Inc.
- 23 4400 NE 77<sup>th</sup> Avenue  
Vancouver, Washington 98662
- 24
- 25
- 26

- 1 Raymond S. Heyman  
Roshka Heyman & DeWulf  
2 Two Arizona Center  
400 Fifth Street  
3 Suite 1000  
Phoenix, Arizona 85004
- 4 Diane Bacon, Legislative Director  
5 Communications Workers of America  
5818 North 7<sup>th</sup> Street  
6 Suite 206  
Phoenix, Arizona 85014-5811
- 7 Charles Kallenback  
8 ACSI  
131 National Business Parkway  
9 Annapolis Junction, Maryland 20701
- 10 Bradley Carroll, Esq.  
Cox Arizona Telcom, L.L.C.  
11 1550 West Deer Valley Road  
Phoenix, Arizona 85027
- 12 Joyce Hundley  
13 United States Department of Justice Antitrust Division  
1401 H Street, N.W.  
14 Suite 8000  
Washington, D.C. 20530
- 15 Daniel Waggoner  
16 Davis Wright Tremaine  
2600 Century Square  
17 15011 Fourth Avenue  
Seattle, Washington 98101-1688
- 18 Elaine Miller  
19 NextLink Communications, Inc.  
500 108<sup>th</sup> Avenue NE, Suite 2200  
20 Bellevue, Washington 98004
- 21 Carrington Phillips  
Cox Communications  
22 1400 Lake Hearn Drive N.E.  
Atlanta, Georgia 30319
- 23 Mark N. Rogers  
24 Excell Agent Services, L.L.C.  
2175 W. 14<sup>th</sup> Street  
25 Tempe, Arizona 85281
- 26

- 1 Robert S. Tanner  
2 Davis Wright Tremaine LLP  
3 17203 N. 42<sup>nd</sup> Street  
4 Phoenix, Arizona 85032
- 5 Mark P. Trinchero  
6 Davis Wright Tremaine LLP  
7 1300 S.W. Fifth Avenue, Suite 2300  
8 Portland, Oregon 97201
- 9 Gena Doyscher  
10 Global Crossing Local Services, Inc.  
11 1221 Nicollet Mall  
12 Minneapolis, Minnesota 55403-2420
- 13 Penny Bewick  
14 New Edge Networks, Inc.  
15 P.O. Box 5159  
16 Vancouver, WA 98668
- 17 Douglas Hsiao  
18 Rhythms Links Inc.  
19 6933 S. Revere Parkway  
20 Englewood, CO 80112
- 21 Karen Clauson  
22 Eschelon Telecom, Inc.  
23 730 2<sup>nd</sup> Avenue S., Suite 1200  
24 Minneapolis MN 55402
- 25 Andrea P. Harris, Senior Manager, Regulatory  
26 Allegiance Telecom, Inc.  
P.O. Box 2610  
Dublin, CA 94568
- Joe Loehman, Managing Director-Regulatory  
SBC Telecom, Inc.  
5800 Northwest Parkway  
Suite 135, Room I.S. 40  
San Antonio, TX 78249
- M. Andrew Andrade  
5261 S. Quebec Street  
Suite 150  
Greenwood Village, CO 80111

25  
26 